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NMED
Hazardous Waste Bureau

Colonel John C. Kubinec
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2000 Wyoming Blvd SE
Kirtland AFB NM 87117-5600

JUL 9 2013

Mr. John Kieling, Manager
RCRA Permits Management Program
Hazardous Waste Bureau (HWB)
New Mexico Environment Department (NMED)
2905 Rodeo Park Road
Santa Fe New Mexico 87505

Dear Mr. Kieling

In the New Mexico Environment Department (NMED) letter dated June 10, 2013, RE: DISAPPROVAL FORMER FUEL OFFLOADING RACK STEP-OUT CONFLICTS, ADDENDUM TO INTERIM MEASURES WORK PLAN, BULK FUELS FACILITY SPILL, APRIL 2013, an explanation for not collecting volatile organic compounds (VOC) samples at all former fuel offloading rack (FFOR) step-out locations was requested. During the October 20, 2011 working group with NMED and Kirtland Air Force Base (KAFB), a verbal agreement was reached that step-out samples would only be collected at the depth(s) at which NMED soil screening levels (SSLs) were exceeded in the original sample location. Additionally, samples would only be analyzed for the particular constituent that exceeded NMED SSLs in the original sample.

Per this agreement, following completion of sampling at all original FFOR soil boring locations, KAFB evaluated the analytes that exceeded current NMED SSLs, and then performed step-out sampling to fully delineate any exceedances of those specific analytes at the depths at which they exceeded the specific SSL. The five new proposed locations cited in the June 10, 2013 letter did not require sampling for VOCs because no VOC exceeded NMED SSLs in the original sample locations. The approved and Final Interim Measures Work Plan (USACE, 2011) states, "the results for the initial set of DPT [direct-push technology] boring soil samples will be reviewed to determine whether the extent of soil contamination exceeding the NMED SSLs has been fully delineated." Shaw has been operating in accordance with the work plan, and the current technique will ensure that soil TPH, VOC, SVOC, and lead contamination will be fully delineated at the FFOR site.



Please contact Mr. L. Wayne Bitner at 505.853.3484 or at ludie.bitner@kirtland.af.mil or Ms. Victoria R. Martinez at 505.846.6362 or at victoria.martinez@kirtland.af.mil if you have any questions.

Sincerely



JOHN C. KUBINEC, Colonel USAF
Commander

cc:

NMED-EHD (Blaine) w/o attch
NMED-HWB (Cobraine, Moats, McDonald, Brandwein) w/attch
NMED-GWQB (J. Schoepner) w/attch
NMED-PSTB (Reuter) w/attch
NMED-OGC (deSaillan) w/o attch
EPA Region 6 (L. King) w/o attch
AFCEE/CMSE (Mr. Oyelowo) w/o attch
Public Info Repository (Central New Mexico) w/attch
Administrative Record/Information Repository (AR/IR) w/attch
File, w/ attch